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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHARLES WINSTON JAMES,
Defendant

Case No. 2:21-MJ-0241-NJK

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Fourth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Navid Afshar, Assistant Federal Public Defender, counsel for Charles Winston James, that the Preliminary Hearing currently scheduled on December 28, 2021 at 4:00 pm, be vacated and continued to a date and time convenient to the Court, but no sooner than seventy-five (75) days.

This Stipulation is entered into for the following reasons:

1. Mr. James's Waiver of Indictment, Filing of an Information, Initial Appearance and Arraignment and Plea is currently scheduled for December 13, 2021. However, because Mr. James's case was reassigned to new counsel, this hearing will need to be continued to

1 permit counsel to have time to meet with Mr. James before going forward. The requested time
2 is necessary to permit Mr. James to confer with new counsel and then enter his plea.

3 2. Mr. James is incarcerated and does not object to a continuance.

4 3. Additionally, denial of this request for a continuance could result in a
5 miscarriage of justice.

6 This is the fourth request for continuance filed

7 herein. DATED this 8th day of December 2021.

8
9 RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

10
11 /s/ *Navid Afshar*
By _____
12 NAVID AFSHAR
13 Assistant Federal Public Defender

/s/ *Jared Grimmer*
By _____
JARED GRIMMER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,
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ORDER

Based on the Stipulation of counsel and good cause appearing,
IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
December 28, 2021 at the hour of 4:00 p.m., be vacated and continued to **March 15, 2022**,
at 4:00 p.m.

DATED this 8th day of December, 2021.

UNITED STATES MAGISTRATE JUDGE